

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

Civil Action No.: 2:21-cv-310

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF DEFENDANTS' OPPOSED
MOTION TO TRANSFER VENUE TO THE DISTRICT OF DELAWARE**

I, Andrew S. Ong, declare and state as follows:

1. I am an attorney at Goodwin Procter LLP, and counsel of record for Defendants in the above-entitled case. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify as to the following.

2. Attached hereto as Exhibit 1 is a true and correct copy of the document filed at D.I. 477 in *TQ Delta, LLC v. 2Wire, Inc.*, No. 1:13-cv-01835-RGA (D. Del.) ("*2Wire*").¹

3. Attached hereto as Exhibit 2 is a true and correct copy of the document filed at D.I. 1028 in the *2Wire* case.

¹ The ECF header for some of the documents from the District of Delaware may not match up to the docket number referenced in this declaration, as some documents were filed in multiple cases and, thus, have an ECF header from another related case.

4. Attached hereto as Exhibit 3 is a true and correct copy of the document filed at D.I. 486 in the *2Wire* case.

5. Attached hereto as Exhibit 4 is a true and correct copy of the document filed at D.I. 1058 in the *2Wire* case.

6. Attached hereto as Exhibit 5 is a true and correct copy of the document filed at D.I. 1276 in the *2Wire* case.

7. Attached hereto as Exhibit 6 is a true and correct copy of the document filed at D.I. 1354 in the *2Wire* case.

8. Attached hereto as Exhibit 7 is a true and correct copy of the document filed at D.I. 445 in the *2Wire* case.

9. Attached hereto as Exhibit 8 is a true and correct copy of the document filed at D.I. 1106 in the *2Wire* case.

10. Attached hereto as Exhibit 9 is a true and correct copy of the document filed at D.I. 1188 in the *2Wire* case.

11. Attached hereto as Exhibit 10 is a true and correct copy of the document filed at D.I. 1239 in the *2Wire* case.

12. Attached hereto as Exhibit 11 is a true and correct copy of the document filed at D.I. 473 in the *2Wire* case.

13. Attached hereto as Exhibit 12 is a true and correct copy of the document filed at D.I. 1585 in the *2Wire* case.

14. Attached hereto as Exhibit 13 is a true and correct copy of the document filed at D.I. 1589 in the *2Wire* case.

15. Attached hereto as Exhibit 14 is a true and correct copy of the document filed at D.I. 535 in the *2Wire* case.

16. Attached hereto as Exhibit 15 is a true and correct copy of the document filed at D.I. 1567 in the *2Wire* case.

17. Attached hereto as Exhibit 16 is a true and correct copy of the document filed at D.I. 1580 in the *2Wire* case.

18. Attached hereto as Exhibit 17 is a true and correct copy of the document filed at D.I. 1370 in *TQ Delta, LLC v. ADTRAN, Inc.*, No. 1:14-cv-00954-RGA (D. Del.).

19. In the Family 3 trial in the *2Wire* case, third party Broadcom Corporation sent a witness, Dr. Gong-San Yu, to testify at the federal courthouse in Wilmington, Delaware.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: November 11, 2021

By: /s/ Andrew S. Ong
Andrew S. Ong